



COMMONWEALTH OF PENNSYLVANIA

June 5, 2025

E-FILED

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of Aqua Pennsylvania, Inc. (hereinafter referred to as “Aqua”, “Company” or “Applicant”) pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the water system assets of the Municipal Authority of the Borough of Greenville (“GWA”) situated within the Borough of Greenville, Hempfield Township, Sugar Grove a Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply water service to the public in the Borough of Greenville, Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania; and (3) an order approving the acquisition that includes the ratemaking rate base of the GWA water system assets pursuant to Section 1329(c)(2) of the Public Utility Code. Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GWA Pursuant to Section 507 of the Public Utility Code / Docket No. A-2024-3049015

Dear Secretary Homsher:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Jason Hails
Roger Cathcart
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania, Inc.	:	Docket No. A-2024-3049015
(hereinafter referred to as “Aqua”,	:	
“Company” or “Applicant”) pursuant to	:	
Sections 1102 and 1329 of the Public	:	
Utility Code for: (1) approval of the	:	
acquisition by Aqua of the water system	:	
assets of the Municipal Authority of the	:	
Borough of Greenville (“GWA”) situated	:	
within the Borough of Greenville,	:	
Hempfield Township, Sugar Grove	:	
Township, and West Salem Township,	:	
Mercer County, Pennsylvania; (2)	:	
approval of the right of Aqua to begin	:	
to offer, render, furnish and supply water	:	
service to the public in the Borough of	:	
Greenville, Hempfield Township, Sugar	:	
Grove Township, and West Salem	:	
Township, Mercer County,	:	
Pennsylvania; and(3) an order approving	:	
the acquisition that includes the	:	
ratemaking rate base of the GWA water	:	
system assets pursuant to Section	:	
1329(c)(2) of the Public Utility Code.	:	
Request for Approval of Contracts,	:	
including Assignments of Contracts,	:	
between Aqua and the GWA,	:	
Pursuant to Section 507 of the	:	
Public Utility Code	:	

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Application of Aqua Pennsylvania, Inc. pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the water system assets of the Municipal Authority of the Borough of Greenville situated within the Borough of Greenville,

Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply water service to the public in the Borough of Greenville, Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania; and (3) an order approving the acquisition that includes the ratemaking rate base of the GWA water system assets pursuant to Section 1329(c)(2) of the Public Utility Code; and Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GWA, Pursuant to Section 507 of the Public Utility Code that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 25, 2025. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor.
Harrisburg, Pennsylvania 17101
relyttle@pa.gov

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: June 5, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania, Inc. : Docket No. A-2024-3049015
(hereinafter referred to as “Aqua”, :
“Company” or “Applicant”) pursuant to :
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assets of the Municipal Authority of the :
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within the Borough of Greenville, :
Hempfield Township, Sugar Grove :
Township, and West Salem Township, :
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system assets pursuant to Section :
1329(c)(2) of the Public Utility Code. :
Request for Approval of Contracts, :
including Assignments of Contracts, :
between Aqua and the GWA, :
Pursuant to Section 507 of the :
Public Utility Code :

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating

concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOI”) in the Application of Aqua Pennsylvania, Inc. pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the water system assets of the Municipal Authority of the Borough of Greenville situated within the Borough of Greenville, Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply water service to the public in the Borough of Greenville, Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania; and (3) an order approving the acquisition that includes the ratemaking rate base of the GWA water system assets pursuant to Section 1329(c)(2) of the Public Utility Code; and Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GWA, Pursuant to Section 507 of the Public Utility Code that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 25, 2025.

The Small Business Advocate files this NOI to protect the interests of Aqua’s and the small business customers currently served by the Greenville Municipal Authority that could be affected by the transaction set forth in the Application.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the Application. The Small Business Advocate will ask the Commission to deny any aspect of the Application that is not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: June 5, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 5, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania, Inc. : Docket No. A-2024-3049015
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1329(c)(2) of the Public Utility Code. :
Request for Approval of Contracts, :
including Assignments of Contracts, :
between Aqua and the GWA, :
Pursuant to Section 507 of the :
Public Utility Code :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Darryl Lawrence, Esquire
Interim Acting Consumer Advocate
PA Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
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Kruti B. Patel, Esquire
Courtney L. Schultz, Esquire
Saul Ewing Arnstein & Lehr LLP
1500 Market Street,
500 Market Street
Centre Square West, 38th Floor
Philadelphia, PA 19102
Kruti.patel@saul.com
Courtney.schultz@saul.com

Date: June 5, 2025

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399